

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DESIREE HOLLIS,)	
)	Case No. 21 C 1956
Plaintiff,)	
)	Judge: Hon. Thomas Durkin
v.)	
)	Mag. Judge: Hon. Jeffrey Cole
THE CITY OF CHICAGO and CHICAGO)	
POLICE OFFICER IOAN BOERIU)	
(#UNKNOWN),)	
)	
Defendants.)	

**DEFENDANTS' SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO
ANSWER OR OTHERWISE PLEAD**

Defendants City of Chicago and Ioan Boeriu, by and through their attorney, Emily R. Bammel, Assistant Corporation Counsel, respectfully requests, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), that this Court extend the time for all defendants to answer or otherwise plead to Plaintiff's First Amended Complaint through and including July 22, 2021. In support of this motion, the Defendants state as follows:

1. On April 12, 2021, Plaintiff filed their initial Complaint against the City of Chicago and a Chicago Police Department Officer. *See* ECF Dkt. #1. Plaintiff's allegations arise from an incident that occurred on or about April 13, 2019. *Id.*
2. On May 21, 2021, Plaintiff filed the instant First Amended Complaint. *See* ECF Dkt. #10. Plaintiff's counsel sent the undersigned counsel the filed Amended Complaint the same date, making the Defendant City's Answer due June 4, 2021. Summons was not issued until June 1, 2021. *See* ECF Dkt. #10.
3. On June 7, 2021, this Court granted Defendant City's first unopposed motion for extension of time to answer or plead through July 6, 2021. ECF Dkt. #13.

4. As of June 29, 2021, Defendant Boeriu had not been formally served with the instant Complaint, however, the undersigned counsel was able to make contact with him via phone correspondence and provide notice of the pending matter. In subsequent phone correspondence, Defendant Boeriu allowed for the acceptance of service on his behalf through Defendant City of Chicago.
5. Based on the lack of prior service, coupled with Defendants' schedules and the upcoming federal holiday, as they impose on the current pleadings schedule, the Defendants require additional time to meet with Defendant Boeriu to provide a responsive pleading.
6. This is the second request for an extension by the Defendants, but the first on behalf of Defendant Boeriu. An extension through and including July 22, 2021 should be sufficient time to provide a responsive pleading to Plaintiff's Complaint, and would not prejudice Plaintiff.
7. On June 29, 2021, the undersigned counsel contacted Plaintiff's counsel via phone correspondence regarding the contents of this motion, which they responded they had no objection to an extension for all named defendants to answer or otherwise plead, up to and including July 22, 2021.

WHEREFORE, the Defendant asks that this Court grant all Defendants an extension of time to answer or otherwise plead to Plaintiff's first amended complaint through and including July 22, 2021, and grant any other relief this Court deems appropriate and just.

Respectfully submitted,

By: /s/ Emily R. Bammel

Emily R. Bammel

Assistant Corporation Counsel

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Counsel for Defendants

CERTIFICATE OF SERVICE

I, Emily R. Bammel, an attorney, hereby certify that I served the above **DEFENDANTS' SECOND UNOPPOSED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD** by causing it to be delivered by the Court's CM/ECF system, which will send notification of such filing and a file stamped copy to all counsel of record, this 30th day of June, 2021. This motion is not noticed for presentment pursuant to the United States District Court for the Northern District of Illinois Ninth Amended General Order 20-0012 and this Court's standing orders.

/s/ Emily R. Bammel

EMILY R. BAMMEL

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